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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

KATHLEEN ESPINOSA, individually and as
personal representative of the Estate of decedent
ASA SULLIVAN; A.S., by and through his
Guardian ad Litem, NICOLE GUERRA;

Plaintiffs,

vs.

CITY AND COUNTY OF SAN FRANCISCO,
a municipal corporation; HEATHER FONG, in
her capacity as Chief of Police for the CITY
AND COUNTY OF SAN FRANCISCO; JOHN
KEESOR, individually, and in his capacity as a
police officer for the CITY AND COUNTY OF
SAN FRANCISCO; MICHELLE ALVIS,
individually and in her capacity as a police
officer for the CITY AND COUNTY OF SAN
FRANCISCO; PAUL MORGADO, individually
and in his capacity as a police officer for the
CITY AND COUNTY OF SAN FRANCISCO;
and, San Francisco police officers DOES 1-25,
inclusive,

Defendants.

Case No. C 06 04686 JSW

**ADMINISTRATIVE MOTION AND
PROPOSED ORDER TO FILE
DOCUMENTS UNDER SEAL**

Time: 9:30 a.m.
Date: May 7, 2008
Courtroom: F

Honorable Magistrate Judge James Larson

MOTION

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to Local Rules 7-11 and 79-5, Plaintiffs hereby move the Court for an Order to File Documents Under Seal, including Plaintiffs Motion to Exceed Ten Depositions by Defendant CITY

1 and the accompanying Declaration of Benjamin Nisenbaum in support of Plaintiffs' Motion to
2 Exceed Ten Depositions.

3 Both the Motion to Exceed Ten Deposition and the Declaration of Benjamin Nisenbaum
4 necessarily contain information that has previously been ordered protected from public disclosure
5 under the Court's Order to File Documents Under Seal in Defendants Motion to Quash Subpoenas,
6 previously filed in this action.

7
8 Dated: April 1, 2008

The Law Offices of John L. Burris

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11 Ben Nisenbaum
12 Attorney for Plaintiff

13 **(PROPOSED) ORDER**

14 **PURSUANT TO THE TERMS OF THE PROTECTIVE ORDER**, Plaintiffs' Motion to
15 Exceed Ten Depositions and the accompanying declaration of Benjamin Nisenbaum in support of
16 said motion, which include information and exhibits protected from public disclosure pursuant to the
17 Court's Order in Defendants' Motion for a Protective Order Quashing Subpoenas in this action, are
18 herewith ordered filed under seal pursuant to Local Rule 79-5.

19
20 **IT IS SO ORDERED.**

21
22 Dated: April 15, 2008

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24 UNITED STATES MAGISTRATE JUDGE